

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

TREVOR JONES,

Defendant

) Criminal No. 23cr10125 ADB-PGL
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SUPERSEDING INDICTMENT

At all times relevant to this Indictment:

1. Defendant TREVOR JONES was a resident of the District of Massachusetts.
2. JONES ran a sex trafficking operation targeting victims who were suffering from substance abuse disorders. As part of his sex trafficking operation, JONES engaged in a pattern of conduct that featured the following:
 - a. JONES selected victims who had a history of and were then-suffering from substance abuse disorders;
 - b. JONES gave victims controlled substances – including heroin, fentanyl, and cocaine – to intensify their drug dependence and gain their compliance, while prohibiting the victims from obtaining controlled substances from other sources;
 - c. JONES facilitated the victims’ commercial sex acts by, among other things,

posting online commercial sex advertisements, providing condoms, booking hotel rooms, and driving victims to the places where the commercial sex acts occurred;

- d. JONES required the victims to give him all of the proceeds earned from engaging in commercial sex acts;
- e. JONES imposed requirements that the victims earn a minimum amount of money per day performing commercial sex acts, and he enforced that requirement with acts of violence, threats of violence, and by withholding controlled substances from drug-dependent victims.
- f. JONES engaged in sexual violence targeting victims, including digitally penetrating victims' vaginas in order to confirm that the victims were not withholding proceeds of commercial sex acts and hiding evidence that they had engaged in unprotected sexual intercourse without his permission.
- g. JONES retained identifications and other personal items of the victims, impeding their ability to leave.

COUNT ONE

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury charges:

3. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2 of this Indictment.
4. From on or about January 1, 2019, and continuing through on or about December 21, 2022, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 1, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT TWO

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

5. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2(a)- 2(e) of this Indictment.

6. From on or about January 1, 2022, and continuing through on or about October 1, 2022, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 2, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 2 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT THREE

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

7. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2(a)-2(f) of this Indictment.
8. From on or about January 1, 2016, and continuing through on or about October 1, 2018, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 3, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 3 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT FOUR

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

9. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2 of this Indictment.

10. From on or about January 1, 2018, and continuing through on or about December 21, 2022, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 4, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 4 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT FIVE

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

11. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2(a)- 2(e) of this Indictment.

12. In or about July 2016, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 5, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 5 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT SIX

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

13. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2(a)- 2(e) of this Indictment.
14. From on or about January 1, 2015, and continuing through on or about December 31, 2017, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 6, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 6 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT SEVEN

Sex Trafficking by Force, Fraud, or Coercion
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

15. The Grand Jury realleges and incorporates by reference paragraphs 1 and 2(a)- 2(e) of this Indictment.

16. From on or about January 1, 2021, and continuing through on or about January 1, 2023, in the District of Massachusetts and elsewhere, the defendant,

TREVOR JONES,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means VICTIM 7, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause VICTIM 7 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

SEX TRAFFICKING FORFEITURE ALLEGATION
(18 U.S.C. § 1594(d))

1. Upon conviction of any of the offenses in violation of Title 18, United States Code, Section 1591, set forth in Counts One through Seven, the defendant,

TREVOR JONES,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property traceable to such property.

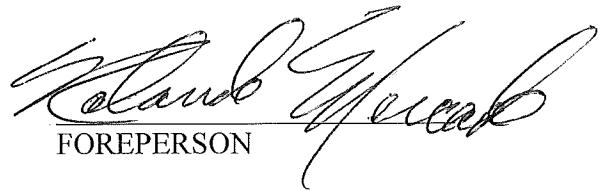
2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 1594(d), as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

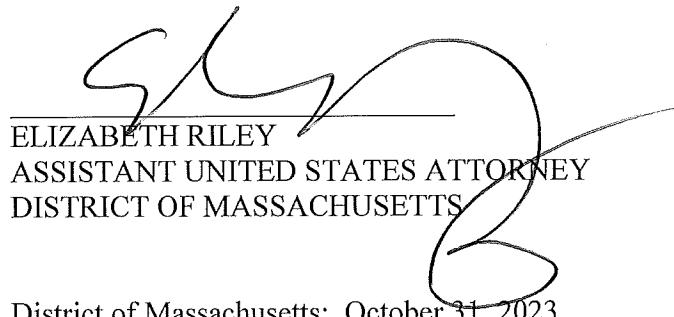
it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 1594(d).

A TRUE BILL



ROLAND W. WINKLER
FOREPERSON



ELIZABETH RILEY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts; October 31, 2023
Returned into the District Court by the Grand Jurors and filed.

/s/Douglas Warnock
DEPUTY CLERK 4:21 PM